

January 21, 2000

VIA AIRBORNE EXPRESS

Donna Caton, Chief Clerk
Illinois Commerce Commission
527 East Capitol Avenue
Springfield, Illinois 62794-9280

Re: Merger Condition 29, SBC/Ameritech OSS Plan of Record

Dear Ms. Caton:

Sprint Communications Company L.P. d/b/a Sprint Communications L.P. ("Sprint") hereby submits its comments to the OSS Plan of Record ("POR") filed by Ameritech Illinois. Sprint intends to participate in the collaborative process set forth in Condition 29 from the Commission's Order in Docket No. 98-0555. Sprint has several concerns regarding the POR as it has been submitted that are detailed below. Sprint recognizes, however, that much of the work to be done to identify improvements that must be made to Ameritech's OSS will be raised in the context of the collaborative process. Thus, Sprint reserves the right to raise additional issues during the collaborative process. Sprint's primary concern is that the POR and the collaborative process actually address the problems that CLECs have experienced with Ameritech's OSS and that solutions be developed. Full importation of SBC's OSS into Illinois without addressing CLEC concerns will avoid the spirit and the letter of the Commission's merger condition. As the Commission knows, fully functional OSS is crucial to the development of competition for all types of customers.

Sprint has been participating in the collaborative process related to OSS improvements for Advanced Services pursuant to the FCC Merger Conditions. As a result of its experience to date in that collaborative, Sprint offers that several improvements can be made to the Ameritech Illinois POR that will make the Illinois collaborative beneficial for all parties.

First, a clear identification and definition of the scope and ultimate desired outcome of the collaborative process should be defined. The POR includes the changes that SBC commits to make to Ameritech's OSS. The POR, however, contains no recognition of CLEC problems with Ameritech's current OSS and how the proposed processes will address the CLEC problems. The POR should include a matrix or action plan that will allow for a detailed analysis of current Ameritech business processes and rules to determine if the solutions proposed by SBC in the POR will solve the problems. Examples of areas where CLEC input could be added include: ordering UNE-P, 855 Transactions, Jeopardy Notification, FOC with changed Due Dates, Address Validation and Editing, xDSL Loop Pre-Qualification, Change Management Process, and CLEC Notification (TCNET). Without a recognition of CLEC problems with Ameritech's OSS, there will be no guarantee that any OSS changes made by SBC actually will address the problems and can be classified as improvements.

Second, the POR does not recognize that the ultimate goal of the collaborative process should be fully functional OSS that obtains the best systems from both SBC and Ameritech. Only then will SBC's promises to implement "best practices" be put into effect.

Third, the POR does not adequately address CLEC Requirements for xDSL loop qualification (at the Central Office level and loop specific), and UNE Ordering and Provisioning including the UNE platform. The parties must build upon the FCC collaborative process for Advanced Services OSS that SBC recently has initiated but within the timelines set forth in the Illinois merger order.

Finally, the POR does not address the third party testing requirements set forth in the Commission's Order. Certainly, the third party tester that the Commission selects will design and perform the testing, but the POR and the collaborative process must also address how CLECs will test systems with SBC/Ameritech. The POR should recognize that any testing and deployment schedules need to support varied CLEC requirements and roll-out schedules.

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In sum, the POR fails in that it does not recognize and address various CLEC operational difficulties contained in Ameritech's OSS. The Commission's desire to improve OSS and hasten competition in Illinois will be achieved if the POR contains the elements mentioned above. Sprint looks forward to participating in the collaborative process and to achieving the goals set forth by the Commission in Merger Condition 29.

Sincerely,

Kenneth A. Schiffman

KAS:sjw
cc: Sam McClerren

Mr. Sam McClerren
Illinois Commerce Commission
527 East Capitol Avenue
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